

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ANAS ELHADY, <i>et al.</i>,)	
)	
Plaintiffs,)	Case No. 16-cv-00375
)	Hon. Anthony J. Trenga
v.)	Hon. Mag. John F. Anderson
)	
CHARLES H. KABLE , Director of the)	
Terrorist Screening Center; in his official)	
capacity, <i>et al.</i> ;)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Plaintiffs Anas Elhady, Baby Doe 2, by his next friend, Father Doe 2, Yaseen Kadura, Osama Hussein Ahmed, Ahmed Ibrahim Al Halabi, Michael Edmund Coleman, Wael Hakmeh, Hassan Shibley, Ausama Elhuzayel, Donald Thomas, Murat Frljuckic, Ibrahim Awad, Mark Amri, Adnan Khalil Shaout, Saleem Ali, Shahir Anwar, Samir Answar, Muhammad Yahya Khan, Hassan Fares, Zuhair El-Shwehdi, and John Does 2-4 (collectively referred as "Plaintiffs") move for summary judgment on liability, and declaratory relief, on Counts I and III of their First Amended Complaint [Dkt. 22] against Defendants, under Federal Rule of Civil Procedure 56 and the Eastern District of Virginia Local Rules.

Summary judgment is appropriate for the reasons attached in the accompanying Memorandum in Support.

WHEREFORE, for the reasons discussed in the accompanying Memorandum in Support, Plaintiffs respectfully request this Honorable Court GRANT their Motion for Summary Judgment on liability and declaratory relief and enter judgment in the form of the attached order.

Respectfully submitted,

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS

BY: /s/ Gadeir Abbas
LENA F. MASRI (DC 1000019) (pro hac vice)
GADEIR I. ABBAS (VA 81161)*
CAROLYN M. HOMER (DC 1049145) (pro hac
vice)
Attorneys for Plaintiffs
453 New Jersey Ave, SE
Washington, DC 20003
Phone: (202) 742-6420

**Gadeir Abbas is licensed in VA, not in D.C.
Practice limited to federal matters.*

AKEEL & VALENTINE, PLLC
SHEREEF H. AKEEL (P54345)
888 W. Big Beaver Rd., Ste. 910
Troy, MI 48084
Phone: (248) 269-9595
shereef@akeelvalentine.com

Dated: March 11, 2019

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2019, I electronically filed the foregoing document with the Clerk of the Court for the Eastern District of Virginia using the ECF System, which will send notification to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS

BY: /s/ Gadeir Abbas
LENA F. MASRI (P73461) (pro hac vice)
GADEIR I. ABBAS (VA: 81161)
CAROLYN M. HOMER (DC 1049145) (pro hac
vice)
Attorneys for Plaintiff
453 New Jersey Ave, SE
Washington, DC 20003
Phone: (202) 742-6420

*Gadeir Abbas is licensed in VA, not in D.C.
Practice limited to federal matters.*